

EXHIBIT 7B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FRANKLIN ARMORY HOLDINGS, INC., a Nevada Corporation; and FRANKLIN ARMORY INC., a Nevada Corporation,

Plaintiffs,

v.

ROBERT JOSEPH GALLAGHER, an individual; and IN THE FIELD DEFENSE, a sole proprietorship,

Defendants.

CIVIL ACTION NO. 2:20-cv-5681

**ROBERT JOSEPH GALLAGHER'S AND IN THE FIELD DEFENSE'S
IDENTIFICATION OF TERMS FOR CLAIM CONSTRUCTION (INCLUDING
INDEFINITENESS)**

Defendants, Robert Joseph Gallagher (“Defendant Gallagher”) and In The Field Defense, a sole proprietorship (n/k/a In The Field Defense, LLC) (“ITFD”) (together, the “Defendants”), pursuant to the Court’s Scheduling Order of July 9, 2021, in this Case (ECF Document 33), hereby identifies the following claim terms for construction (including a construction of indefiniteness):

1. disconnector assembly
2. hammer retention facility
3. second hammer hook

All pending claims have been rejected in the pending Reexamination of the ‘461 Patent. Accordingly, Defendants may amend the foregoing listing to reflect changes to the claims arising from such Reexamination. The foregoing identification does not waive Defendants’ rights to refute claim constructions proffered by Plaintiffs for these or other claim terms, such rights

including Defendants' proposing proper constructions (including indefiniteness) for any claim terms identified by either Party in subsequent briefings related thereto, consistent with, or as provided for, in this Order and in subsequent proceedings in this case.

ARCHER & GREINER
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DATED: August 19, 2021
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